

BRENDAN M. KUNKLE (SBN 173292) bkunkle@abbeylaw.com

MICHAEL D. GREEN (SBN 214142) mgreen@abbeylaw.com

**ABBEY, WEITZENBERG, WARREN & EMERY, P.C.**

100 Stony Point Road, Suite 200

Santa Rosa, CA 95401

Telephone: 707-542-5050

Facsimile: 707-542-2589

*Attorneys for Fire Victim Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

-and-

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

☐ Affects PG&E Corporation

☐ Affects Pacific Gas and Electric Company

☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**NOTICE OF MOTION TO ALLOW/DEEM  
TIMELY LATE FILING OF PROOFS OF  
CLAIM**

Date: January 12, 2021

Time: 10:00 a.m.

Dept: Telephonic/Video Appearances Only

United States Bankruptcy Court

450 Golden Gate Ave.

Courtroom 17, 16th Floor, San Francisco, CA

Judge: Hon. Dennis Montali

Objection Deadline: January 5, 2021

PLEASE TAKE NOTICE that the Bankruptcy Court will hear and consider the Motion to Allow/Deem Timely Late Filing of Proof of Claim by Movants listed on Exhibit A attached hereto, on January 12, 2021 at 10:00 a.m. (Pacific Time) ("Movants' Late Claim Motion") via video conferencing or telephone.

All interested parties should consult the Bankruptcy Court's website at [www.canb.uscourts.gov](http://www.canb.uscourts.gov) for information about court operations during the COVID-19 pandemic. The Bankruptcy Court's website provides information regarding how to arrange a telephonic or video appearance. If you have any questions regarding how to appear at a court

1 hearing, you may contact the Bankruptcy Court by calling 888-821-7606 or by using the Live  
2 Chat feature on the Bankruptcy Court's website.

3 PLEASE TAKE FURTHER NOTICE that the deadline to object to the Movants' Late  
4 Claim Motion is January 5, 2021.

5 PLEASE TAKE FURTHER NOTICE that copies of the Movants' Late Claim Motion can  
6 be viewed and obtained: (i) by accessing the Court's website at <http://www.canb.uscourts.gov>, (ii)  
7 by contacting the Office of the Clerk of the Court at 450 Golden Gate Avenue, San Francisco, CA  
8 94102, or (iii) from the Debtors' notice and claims agent, Prime Clerk LLC,  
9 at <http://restructuring.primeclerk.com/pge> or by calling (844) 339-4217 (toll free) for U.S.-based  
10 parties; or +1 (929) 333-8977 for international parties or by e-mail at: [pginfo@primeclerk.com](mailto:pginfo@primeclerk.com).

11 Note that a PACER password is needed to access documents on the Bankruptcy Court's website.

12  
13 DATED: December 2, 2020

**ABBEY, WEITZENBERG, WARREN & EMERY PC**

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15 By: /s/ Brendan M. Kunkle

BRENDAN M. KUNKLE (SBN 173292)

16 **ABBEY, WEITZENBERG, WARREN &  
EMERY PC**

17 100 Stony Point Road, Suite 200  
Santa Rosa, CA 95401

18 Telephone: 707-542-5050

19 Facsimile: 707-542-2589

bkunkle@abbeylaw.com

*Attorneys for Numerous Fire Claimants*

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**CERTIFICATE OF SERVICE**

I hereby certify that on December 2, 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system.

/s/ Brendan M. Kunkle  
Brendan M. Kunkle

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# EXHIBIT A

## LIST OF MOVANTS

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1. Stafford, Jack  
3968 Shelter Glen Way  
Santa Rosa, CA 95404  
Date of Birth: September 13, 1998  
Parents: Chris and Cathleen Stafford
  2. Nealon, Bo  
4645 Aptos Court  
Santa Rosa, CA 95403  
Date of Birth: May 21, 1997  
Parents: Michael Nealon
  3. Nealon, Sienna  
4645 Aptos Court  
Santa Rosa, CA 95403  
Date of Birth: August 25, 1999  
Parents: Michael Nealon
  4. Vierra, Kenleigh  
5366 Linda Lane  
Santa Rosa, CA 95404  
Date of Birth: October 1, 1999  
Parents: Louis and Maria Vierra
  5. Vierra Kiernan  
5366 Linda Lane  
Santa Rosa, CA 95404  
Date of Birth: October 1, 1999  
Parents: Louis and Maria Vierra
  6. Honighausen, Alexis  
5300 Wikiup Bridge Way  
Santa Rosa, CA 95404-1125  
Date of Birth: December 6, 1996  
Parents: Ulrich and Amanda Honighausen
  7. Honighuasen, Elena  
5300 Wikiup Bridge Way  
Santa Rosa, CA 95404-1125  
Date of Birth: January 20, 1999  
Parents: Ulrich and Amanda Honighausen

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8. Lafferty, Roisin  
3906 Hansford Court  
Santa Rosa, CA 95404-7678  
Date of Birth: October 3, 1997  
Parents: Patrick Lafferty and Gerardine Finn

9. Lafferty, Sinead  
3906 Hansford Court  
Santa Rosa, CA 95404-7678  
Date of Birth: July 4, 1994  
Parents: Patrick Lafferty and Gerardine Finn